

1-3; 50-54.] Since then, the Court has temporarily and preliminarily restrained the Defendants from engaging in certain illegal conduct, frozen the assets of Defendants and Relief Defendants, and ordered each Defendant and Relief Defendant to account for the use and disposition of investor funds, among other things. In addition, the Court has issued contempt orders as to Defendants Dunlap and Schmidt, and issued warrants for their arrests. [Dkt. 39-41.]

2. The Shamoon Relief Defendants have fully complied with all orders to which they are subject and have provided the SEC with all accountings due at this time under the Court's Order. The Shamoon Relief Defendants have also timely responded to the SEC's First Request for the Production of Documents and provided all responsive documents to which they have access as required by the Court's Order.

3. The SEC and the Shamoon Relief Defendants are the only parties to the lawsuit who have appeared in this matter—no Defendants or other Relief Defendants have answered or otherwise appeared. As such, it is impossible to file an agreed proposed scheduling order amongst all parties at this time.

II. JOINT MOTION

In light of the foregoing, the Parties move the Court to postpone the filing deadline on a joint proposed scheduling order for 30 days, or until further Court Order.

The Parties seek an extension not for purposes of delay, but in the interest of justice.

CONCLUSION

THEREFORE, the Parties respectfully request that the Court: (1) grant the motion to postpone the filing of a scheduling order by 30 days or until further Court order; and (2) grant such further relief to which the Parties may be entitled.

DATED: July 7, 2020

Respectfully submitted,

/s/ William B. Mateja

William B. Mateja
Texas Bar No. 13185350
bmateja@sheppardmullin.com
Jason C. Hoggan (*pro hac vice*)
Texas Bar No. 24083188
jhoggan@sheppardmullin.com
SHEPPARD MULLIN RICHTER &
HAMPTON LLP
2200 Ross Avenue, 24th Floor
Dallas, Texas 75201
Telephone: (469) 391-7400
Facsimile: (469) 391-7401

**COUNSEL FOR RELIEF
DEFENDANTS PRAMANA CAPITAL,
INC. AND PETER K. SHAMOON**

/s/ Jennifer D. Reece

Jennifer D. Reece
Texas Bar No. 00796242
James E. Etri
Texas Bar No. 24002061
United States Securities and Exchange
Commission
Burnett Plaza, Suite 1900
801 Cherry Street, Unit 18
Fort Worth, Texas 76102
Direct phone: (817) 978-6442 (JDR)
Fax: (817) 978-4927
reecej@sec.gov

**COUNSEL FOR PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION**

CERTIFICATE OF SERVICE

I certify that on July 7, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties according to FED. R. CIV. P. 5(b)(2).

/s/William B. Mateja

William B. Mateja